



July 16, 2017

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Docket 17-108 -- Restoring Internet Freedom

Dear Ms. Dortch:

Weather data, forecasts and warnings save lives, prevent bodily injury and greatly reduce property damage. Seconds count when severe weather, tornadoes, hurricanes, lightning, and flash floods threaten. The U.S. may have the worst weather on the planet, but we have the best and most available weather information in the world. We need to insure that accessibility continues.

Every day almost two billion people worldwide rely on AccuWeather, the global leader in weather information services and digital media to help them protect their lives, property, businesses and customers, and get more from their day. AccuWeather provides hour-by-hour and minute-by-minute forecasts with Superior Accuracy, with customized content, and engaging video presentations available through smart phones, tablets, free wired and mobile Internet sites (via AccuWeather.com), award winning AccuWeather apps, connected TVs, wearables, smart homes, and connected cars, as well as radio, television, newspapers, and the AccuWeather Network cable channel.

AccuWeather Enterprise Solutions provides critical weather information services to more than 240 of Fortune 500 companies and thousands of businesses and government agencies worldwide. Government and emergency management agencies also rely on AccuWeather for the best forecasts of severe weather events – blizzards, floods, tornadoes, hurricanes, cyclones, and others - available from any source. By forecasting and communicating the weather the most accurately and effectively worldwide, focusing on impacts - telling people how, why, and what they need to do in order to



save lives and minimize losses - AccuWeather has saved tens of thousands of lives and prevented tens of billions of dollars in property damage.

AccuWeather warnings alone have saved tens of thousands of lives and prevented billions of dollars in property damage.

As a global digital media business with worldwide scale, we offer unique perspective about the importance of life-saving critical weather information for persons wanting to access this information online and through mobile web sources. Immediate access to information is critical especially with regard to weather information that affects life and property when seconds count.

Recognizing the critical importance of life-saving weather information services, President Donald Trump signed into law, H.R. 353 – The Weather Research and Forecast Innovation Act of 2017, creating Public Law 115-25. AccuWeather was a prime supporter of this legislation. The legislation seeks to improve the National Oceanic and Atmospheric Administration's (NOAA) weather research through a focused program of investment on affordable and attainable advances in observational, computing, and modeling capabilities to support substantial improvement in weather forecasting and the prediction of high impact weather events, specifically tornadoes, hurricanes and floods.

Under the current Net Neutrality rules, the Federal Communications Commission has provided – “Priority Status” to Emergency Services, Cyber-Security Monitoring, and VoIP services because all these services require “priority” for maximum effectiveness. Given the enormous impact of how weather events affect communities across the United States, AccuWeather recommends that weather information service companies be afforded the same consideration for “Priority Status”.

According to the Pew Research Center's American Trends Panel, twenty years ago, only 12% of U.S. adults got news and weather information online. Today, 81% receive live-saving news and weather information by web and mobile devices. Almost six-in-ten persons (62%) access their news and weather information through social media – a figure that rises to 84% when surveying 18- to 29-year-olds. Americans have also



reached a point where a large majority of the public (72%) gets its news and weather information on a mobile device. As consumers have changed the ways they access news and weather, they also have new ways to interact with it – and new sources to inform them, like AccuWeather and the other weather information companies that provide life-saving weather information about natural hazards like blizzards, floods, hurricanes and tornadoes.

Social science researchers have discovered how often consumers – given their access to highly detailed and frequently updated weather information – often check weather websites and their mobile devices receive the latest weather forecast and warnings. “Having accurate weather information” is of paramount importance to American consumers. For this reason AccuWeather created the MinuteCast weather forecast to enable consumers to have up-to-the-minute weather information in real time. As storms approach any community, more persons increasingly turn to online and mobile sources to access critical life-saving weather information services. And when that happens, seconds count.

Additionally, time is becoming even more the essence with evolving capabilities around push technology. AccuWeather has developed unique features within our mobile applications, which enable a user to subscribe to severe weather warnings and other alerts which are pushed automatically to their device when severe weather threaten, enabling the users to take potentially life-saving actions.

Weather information services from companies like AccuWeather provide targeted localized content that is site-specific for consumers to properly understand the importance of Severe Weather Warnings for their area so they can take potentially life-saving actions or just to know if it will rain today.

The NOAA National Centers for Environmental Information (NCEI) monitors and tracks severe weather and climate events from a historical perspective. As part of its responsibility of monitoring and assessing the climate, NCEI tracks and evaluates climate events in the U.S. and globally that have great economic and societal impacts. NCEI is frequently called upon to provide summaries of global and U.S. temperature and precipitation trends, extremes, and comparisons in their historical perspective. NCEI has



specifically reviewed weather and climate events that have had the greatest economic impact from 1980 to 2017. The U.S. has sustained 212 major weather and climate disasters since 1980 where overall damages/costs reached or exceeded \$1 billion (including CPI adjustment to 2017). The total cost of these 212 alone events exceeds \$1.2 trillion. Furthermore, almost daily across the nation, lives are saved by timely weather information and warnings.

In 2013 an article published in The Washington Post about a report from the Environment America Research and Policy Center said 243 million people – nearly 80 percent of the U.S. population – live in counties that experienced at least one weather-related disaster since 2007.

There are numerous examples that demonstrate how weather information services provide immediate critical life-saving information that emergency management agencies, power companies, fire fighters, law enforcement agencies and other “first responder” organizations rely on for them to support their “*priority services*” in their mission of saving of lives and property.

We urge the Commission’s consideration of our recommendation.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joel N. Myers", with a long horizontal flourish extending to the right.

Dr. Joel N. Myers
Founder, Chairman and President